

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ENDEL WILLIAMS,
Plaintiff,

CIVIL ACTION NO. 18-CV-1232

v.

CITY OF RACINE,
Defendant.

**STIPULATION TO EXTEND TIME FOR DEFENDANT CITY OF RACINE TO
FILE A RESPONSE TO PLAINTIFF’S COMPLAINT AND JOINT MOTION TO
APPROVE THIS STIPULATION’S TERMS**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiff Endel Williams (the “Plaintiff”) and Defendant City of Racine, (the “Defendant”), by their undersigned attorneys, hereby agree and stipulate that the deadline for the Defendant to answer, move, or otherwise respond with respect to the Plaintiff’s Complaint filed in this case on August 10, 2018 (the “Complaint”) is extended to and through September 24, 2018. The Plaintiff and Defendant jointly move this Court for an order affirming the parties’ agreement and entering an order consistent with its terms. The grounds justifying this Stipulation and Joint Motion are:

1. Plaintiff filed a Complaint in this case on August 10, 2018. (ECF No. 1.)
2. The parties agree that the City was served with the Complaint on August 20, 2018. As such, the City’s deadline to respond to the Complaint in any manner allowed under Rule 12 would be September 10, 2018.
3. Given the nature of the Complaint, including but not limited to the number of allegations and issues involved, the Defendant requires more than the twenty-one days

provided under Rule 12 to answer, move, or otherwise respond with respect to the Complaint.

4. Given these circumstances, Plaintiff's counsel consented to the Defendant's requested extension and agreed to join in this Stipulation and Joint Motion. The relief stipulated to herein is for good cause and will not result in undue delay in the administration of this case. This is the first extension of time requested by either party and no deadlines have been set in this case. For these reasons, good cause exists to grant the extension stipulated to by the parties in this Stipulation and Joint Motion.

WHEREFORE, Plaintiff and Defendant STIPULATE AND AGREE as follows:

1. The deadline for the Defendant to answer, move, or otherwise respond with respect to the Plaintiff's Complaint dated August 10, 2018, is extended to and through September 24, 2018; and
2. The Court may enter an Order consistent with the terms of this Stipulation and Joint Motion.

Stipulated and respectfully submitted.

Dated this 4th day of September 2018.

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Dated this 4th day of September 2018.

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